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JAN 26 1998

Before the
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Competitive Bidding for
Mutually Exclusive
Broadcast Applications

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MM Docket No. 97-234
GC Docket No. 92-52 ✓
GEN Docket 90-264

To: The Commission

COMMENTS OF J&M BROADCASTING, INC.

J&M Broadcasting Co., Inc. ("J&M"), by its attorney, hereby files its comments with respect to the Commission's Notice of Proposed Rule Making, FCC 97-397, released November 26, 1997 ("NPRM"). J&M's application for a new FM station at Carmel, California, File No. BPH-880211MN, is mutually exclusive with the application of Highlands Broadcasting Co., Inc., for the same facility. J&M thus has a direct interest in the outcome of this proceeding.

As the Commission is aware, J&M was awarded the construction permit, after a comparative hearing, at all levels of the Commission. It was the most qualified applicant according to the Administrative Law Judge, the Review Board, and the full Commission. Lone Cypress Radio Associates, Inc., 7 FCC Rcd 403 (Rev. Bd. 1992), rev. Denied, 8 FCC Rcd 972 (1993), recon. denied, 8 FCC Rcd 6635 (1993). J&M prevailed as a result of its superior integration enhancements, for both it and Highlands received 100% quantitative integration credit. Highlands appealed the Commission's decision to the Court of Appeals for the D.C. Circuit on the basis that the Commission had improperly analyzed the applicant's comparative enhancements. However, before the Court could rule on Highlands'

appeal, the Court issued its Bechtel decision nullifying the use of integration as a comparative criterion. The Commission then sought and obtained a remand from the Court pending adoption of new comparative criteria.

Notwithstanding Highlands' appeal, J&M constructed and began operating its Carmel station, call letters KBOQ, prior to the Bechtel decision. It has been permitted to remain on the air pending a final disposition of the proceeding.¹ Accordingly, J&M falls within the ambit of those applicants addressed in paragraph 22 of the NPRM. There the Commission indicates an interest in resolving cases such as J&M's via a decision on the comparative merits, in lieu of proceeding to an auction, and requested comments on this approach.

J&M strongly supports resolving cases which have progressed beyond an evidentiary hearing through the comparative process. Further, J&M urges the Commission to utilize as criteria those elements which formerly were considered a qualitative integration enhancements, i.e. local residence, prominent civic activities, and to a lesser extent, broadcast experience.

The relatively few competing applicants who have completed a comparative hearing and received an initial decision, or even the fewer number who have progressed through a Commission decision, should not be forced to bid on the frequency at an auction. Their basic qualifications have been tested, and at least an initial determination made. The Commission is thus well aware of who the

¹ Highlands Broadcasting Co., Inc., 9 FCC Rcd 5746 (1997).

applicants are and what benefits they would bring to the public. As a result, the Commission will be able to adjudicate these cases relatively quickly, for the existing hearing record would provide much the information required; any needed supplemental information could be obtained without undue delay. The concern of Congress and the Commission over the delay comparative hearings may cause before service is established, as noted in paragraph 3 of the NPRM, is therefore not present in these cases.

Moreover, these applicants have spent many thousands of dollars on hearing fees, attorneys fees, and other expenses, with the understanding that their applications would be evaluated under the standard comparative issue. The Commission included such a statement in opening every FM filing window; in all services, the Commission stated as much in its Hearing Designation Orders. This applicant's financial plans took hearing costs into account; it certainly did not contemplate an auction. It would be extremely unfair for the Commission now to require these applicants to bid for the construction permit, thus awarding the permit to the applicant with the most financial resources, when the process would not thereby be made more efficient or expeditious.

Moreover, it is likely that the public would suffer were auctions required in cases where applicants have been through hearings and beyond. At the time these applicants filed their applications, they were required to have reasonable assurance of sufficient funds to construct the station and operate it for three months without revenue. Included in this cost estimate was an

amount for a comparative hearing. It did not include an additional amount to be paid at auction, for no auction was contemplated. It is likely that some applicants will be unable to effectively participate in any auction for lack of funds. Even those who are able to proffer bids will be forced to expend resources to fund the auction payment, resources which otherwise could go toward improved station operations. An impoverished station is not able to serve its public as well as one with adequate resources. The public does not benefit from stations who are unable to afford, for example, local news reporters, because the available funds were diverted to auction payments.

The applicants in these cases are generally not large corporations with lines of credit or other financial resources available. J&M, for example, is owned by two individuals, Stoddard Johnston and Sherrie Yokomizo McCullough. Mr. Johnston is a long term broadcaster, a resident of the Carmel area, and is active in community organizations and activities. Ms. McCullough, a Carmel resident, was also very involved in community activities in their station's service area for a number of years prior to receiving the KBOQ construction permit. The competing applicant, Highlands Broadcasting Co., Inc., is also owned by an individual who has owned an AM station in Carmel for a number of years. J&M's financial resources are those available to its two individual owners; they have gone toward station construction and operation, which, as is shown herein, has provided great benefit to Carmel and the surrounding area. Extracting a significant additional payment

from an auction would necessitate a reduction in the public service J&M is able to provide.

All four stations which have begun broadcasting despite not receiving a final grant are in small markets, Selbyville, Delaware, Biltmore Forest, North Carolina, and Middletown, Maryland, in addition to Carmel. These are not markets in great demand by multi-station owners. It is unlikely that these stations would bring their owners a windfall if and when they are sold.² The amount of the winning bid for any of these stations is likely to be relatively small in terms of benefitting the public treasury, yet may be significant in terms of the ability of the station to provide the level of public service it desires.

As the Commission is aware, a significant number of a broadcast stations lose money. During their initial years of operation, most stations do not make a profit. They must extensively promote their arrival, as well as compete against other stations in the area, television, cable, and print media. Often

² One of the primary cases which the Bechtel Court noted in suggesting that permittees who obtain their permits as a result of a comparative hearing may immediately sell the station to one with lesser comparative qualifications was Debra D. Carrigan, 100 FCC 2d 721 (Rev. Bd. 1985) rev. denied, 104 FCC 2d 826 (1986), aff'd sub nom. Bernstein/Rein Advertising, Inc., v. FCC, 830 F2d 1188 (dc Cir. 1987). Counsel for J&M is well familiar with that situation, as he was counsel for Ms. Carrigan. Ms. Carrigan contracted to sell the station, KJUL, only after falling into severe financial difficulties. Moreover, the proposed sale was not consummated, and the station eventually sold for a substantially reduced amount. Both she and her wholly-owned licensee corporation declared bankruptcy before the sale was consummated. Moreover, the station was to be sold to a minority controlled entity, thus furthering the Commission's important goal of increasing minority ownership. Carrigan's proposed sale of KJUL served the public interest.

potential advertisers will wait for a station to demonstrate a certain ratings level before purchasing advertising. It is during this formative period that a new station establishes itself in the community, and demonstrates that it provides a service to its listeners. The community will suffer through less local news and public affairs programming if the licensee has to make a substantial auction payment in addition to the thousands of dollars spent participating in a hearing process.

Applicants who are forced to expend nearly all their resources to outbid competing applicants, after having competed through a hearing and appeals, may be forced into adopting the least expensive approach to both construction and operation. This may require used equipment in lieu of state-of-the-art new equipment, which may adversely affect the station's reliability and the listener's enjoyment. It is well known that stations today can operate with a minimum staff. Again, stations left financially strapped may have no choice but to opt for such a low cost approach, providing little or no local information. The public interest would be better served were the station able to employ sufficient staff to become a local presence, and truly do all it can to serve its community.

For these reasons, in cases involving applicants who have completed a comparative hearing, the Commission should determine which applicant will better serve the public, and not leave the outcome to an auction. As it stated in its Policy Statement on Comparative Broadcast Hearings, 1 FCC 2d 393 (1965), best practica-

ble service to the public is a primary objective in its comparison of competing applicants. There are meaningful criteria which the Commission can utilize in drawing reasonable conclusions about which applicant will best meet that objective.

In the NPRM, the Commission sought comments on what comparative criteria would be appropriate. J&M believes certain of the Commission's prior criteria are still appropriate for use in evaluating competing applicants. Assuming no decisional differences between competing applicants in coverage, as is the case in the Carmel proceeding where both applicants propose the same transmitter site, it is appropriate for the Commission to assess those characteristics previously considered enhancements to quantitative integration in evaluating competing applicants. Also, where the applicant, or a significant principal, has a prior broadcast record as an owner, this may be considered.

In the aforementioned Policy Statement, the Commission noted that past local residence and civic involvement indicate a likelihood of continuing knowledge of changing local interests and needs. While the 1965 Commission believed that ownership integration was necessary to put this knowledge to use in the operation of the station, the Bechtel court held that this is not necessarily the case. Station owners will always influence the operation of their stations, whether or not they actively participate in day to day management. They are the ones who have invested their own money into the station and have the greatest interest in seeing the station be successful. The Commission's 1965 assumption that only

integrated owners will put their knowledge of the area to use in the operation of the station, not subsequently verified, was successfully challenged in the Bechtel case. However it is only logical that an owner who has demonstrated knowledge and concern for his community by compiling a record of civic involvement and local residence will make sure that his station also puts forth greater efforts toward community benefit and improvement. The station will act as an extension of the owner's community involvement. On the other hand, mere local residence, without a showing of involvement in community affairs, or at least a knowledge of important community needs and interests, does not presage a better-than-average interest in the community, and should not result in comparative merit.

J&M's record while operating KBOQ, while inadmissible for purposes of resolving its comparative case, is instructive in demonstrating the validity of this approach.

Both Mr. Johnston and Ms. McCullough had long and distinguished careers in areas calculated to lead to better service to the public by their radio station. Their resumes are provided as Attachments 1 and 2.

As a direct result of the community knowledge and civic involvement of its principals, Stoddard Johnston and Sherrie Yokomizo McCullough, KBOQ-FM has provided exceptional service to its listeners, receiving numerous awards and citations. KBOQ-FM's accomplishments are all the more striking as it has had to operate without permanent authority. This has limited to some extent some

advertisers' willingness to commit to the station, reducing its revenues and thereby its ability to be as involved as it desires.

Nevertheless KBOQ-FM has performed admirably since going on the air, and is an example of an outstanding station whose service to the public is directly related to the interests its owners have in serving the area's needs.

In the relatively brief period since it went on the air, KBOQ-FM has been honored by many different community groups and organizations.

Attachment 3 hereto contains copies of honors and awards presented to KBOQ since going on the air, along with testimonials to the station. In particular, KBOQ was voted the area's best radio station in 1994 and 1995, by the readers of the Coast Weekly magazine. The station was given a Benefactor of the Arts Award by the Cultural Council for Monterey County in 1996. In 1995, the Salvation Army presented a Certificate of Appreciation to KBOQ for its assistance to that worthy organization. The Monterey Bay Area Governments, in October 1997, awarded KBOQ a Certificate of Appreciation for its contributions to the 4th annual Tri-County Economic Conference.

Most recently, the Carmel Music Society recognized KBOQ, and particularly its co-owner Sherrie McCullough, for the efforts in promoting the arts in all segments of the community. KBOQ's involvement in the local arts scene was found vital to the quality of life for area residents.

KBOQ's service to the community has been recognized by a

number of important individuals. In 1994, the Mayor of Carmel-by-the-Sea indicated his support for KBOQ's service to the community. Also, individual listeners, such as Jon R. Hagstrom, d'Aulan Gentry, and L. A. Niedfeldt have taken the time and effort to advise the Commission of the benefits KBOQ has brought to the community. KBOQ was commended only last month for its assistance in the fund-raising drive of Interim, Inc., a non-profit mental health agency.

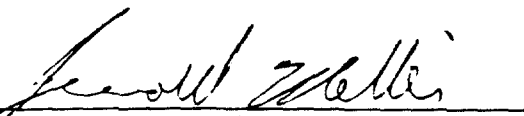
Other community activities supported by KBOQ include the Cultural Council of Santa Cruz County, the Monterey County Free Libraries, Santa Cruz Public Libraries, the St. Mary's-by-the-Sea Episcopal Church, the Second Harvest Food Bank, the Camerata Singers of Monterey County, Beacon House Art Auction, Friends of Moss Landing Marine Laboratories, Inc., the Alzheimer's Association, the Chartwell School, Aspira Foster & Family Services, Monterey Bay Independent Booksellers, First Night Santa Cruz (1997), the Monterey County Film Commission, Native Animal Rescue, and First Night Monterey (1998), to name only a portion. Clearly, KBOQ, drawing upon the demonstrated community knowledge and interest of its owners, has provided superior service to Carmel and the Monterey Peninsula.

Accordingly, the Commission should resolve those few cases which progressed beyond an initial decision by a comparative evaluation, based upon the qualitative enhancements of the applicants. The record of KBOQ demonstrates the validity of this approach by favoring those applicants who, by their past actions

are most likely to further the public interest and provide service which is most responsive to the needs and interests of the station's listeners. It would be unfair to the applicants and disserve the public to require an auction. Moreover, institution of a three-year holding period would ensure sufficient public benefit from the choice of applicants to justify this approach.

Respectfully Submitted,

J&M BROADCASTING, INC.

By 
Jerrold Miller
Its Attorney

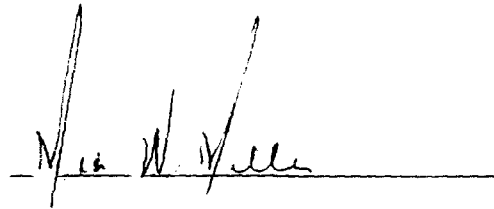
January 26, 1998

Miller & Miller, P.C.
P.O. Box 33003
Washington, DC 20033

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January , 19 98, a copy of the foregoing document was placed in the United States mail, first class postage prepaid, addressed to the following:

David Hunsaker
Putrese Hunsaker & Trent, P.C.
100 Carpenter Drive
Suite 100
Sterling, VA 20167-0217

A handwritten signature, likely "David Hunsaker", is written over a horizontal line.

RESUME OF STODDARD JOHNSTON

Mr. Johnston first became involved in broadcasting in 1950, only a few years after being discharged from military service, having served in the Pacific during World War II. His first position in radio was in local sales for the National Broadcasting Company in Cleveland, Ohio from 1950-51. Between 1951 and 1953, he again served his country as a first lieutenant in the infantry in Korea during that conflict.

In 1954, Mr. Johnston returned to broadcasting, and he has been involved in the industry continuously since that time. His first position was sales manager of KLX(AM), Oakland, California, where he remained until 1958. His subsequent positions were:

KTVU-TV, Oakland, CA 1958-61, Local Sales
KRGV (AM) -TV, Weslaco, TX 1961-64, President, Gen. Mgr.
KMBY(AM), Monterey, CA, 1964-68, President, Gen. Mgr.
KMST-TV, Monterey, CA, 1968-80, Chairman
KWAV-FM, Monterey, CA, 1968-80, President, Gen. Mgr.
KMBY-FM, Seaside, CA, 1982-85, President, Gen. Mgr.

Mr. Johnston has been a resident of the Carmel area since 1964, and has also taken the effort to contribute to a number of civic and community organizations in the Carmel area. These are given on the attached page.

1995 to date

President, Economic Development Corporation
for Monterey County
1981-1984

President, Community Foundation
1979-1981

President, Asilomar Operating Corporation
(California Park & Recreation)
1973-1992

President, Monterey Bay Girl Scout Council
1974-1976

Girl Scouts of USA, New York City
Board Member, 1976-1979

California State Park Foundation
Board Member, 1992 to date

Salvation Army
Board Member, 1996- to date

Monterey County Symphony
Past Board Member

Monterey Peninsula Museum of Art
Past Board Member

Monterey Peninsula Chamber of Commerce
Past Board Member

Yale Club

RESUME OF SHERRIE YOKOMIZO MCCULLOUGH

Ms. McCullough has been a local Carmel area resident since age 4, graduating from the local Pacific Grove High School. Ms. McCullough also has a distinguished record of civic and community involvement in the Carmel area.

She is currently a trustee for the following Carmel area organizations:

Community Hospital of Monterey Peninsula
Sunset Center Renovation Board of Carmel
Monterey Institute of International Studies
Pacific Repertory Theatre
Sisters of the Arts

In addition to being a trustee, Ms. McCullough held important offices in the following organizations prior to KBOQ going on the air:

Campaign Chair, United Way
President, Monterey Peninsula Chamber of Commerce
President, for four years, of the Monterey County Symphony

Ms. McCullough's personal contribution to the betterment of Carmel was recognized as far back as 1988 when the Carmel Chamber of Commerce awarded her the prestigious Robert C. Littlefield Award for her contribution to Chamber goals. This is presented to one person each year. She was presented a Congressional Award by then Congressman Leon E. Panetta for outstanding contribution to the community, state and nation. In 1992, the Soroptimist Internation-

al of the Americas. Monterey Peninsula Chapter, presented Ms. McCullough with its Women of Distinction Award in recognition of her accomplishments in the area of economic development. More recently, she received the "Benefactor of Art" Award for 1997 from the Monterey County Cultural Council in recognition of her involvement and personal contribution in many ways to the arts community.

Attachment 3



been quite active with outreach programs from North to South County.

Runner Up: Pacific Repertory Theater

years ago. KBOQ has now settled in with the soothing rich charms of classical music that can soothe the savage breast. David Witrock continues to lead-off the day before the station returns to satellite-fed programming. (Speaking of savage breasts, look who managed to sneak in as this year's runner up — making it into the win-place-show circle for the first time ever.)

Yep, Runner Up: KPIC



BEST

three spir

620 Lighthouse Ave. • I

WOULD ALSO LIKE T
THAT HAVE MA
We love you! • S

Best Politician

White House Chief of Staff Leon Panetta


It's been two years since our longtime congressman got the call from Bill to take a desk job over at the White House, but this local boy is still very much on the minds of our readers. The good news is you're not a politician any more. The bad news? You're an administrator...

Runner up: Congressman Sam Farr

Best Idea for
a CSUMB Mascot
Sea Otter

Despite the occasional votes for sardines, seals, squid, dolphin, whales and even one ballot for nudibranchs, nothing could deter readers from overwhelmingly selecting the sea otter as the best mascot. And why not? Once nearly decimated, sea otters have made a dramatic comeback along the Central Coast and have come to symbolize the abundance and diversity of marine life in our area. And besides, they're so darn cute.

*at least 2 yrs
in a row.*



Best Radio Station

KBOQ, 95.5FM

For the second year in a row, classical K-Bach weighs in as your choice for best

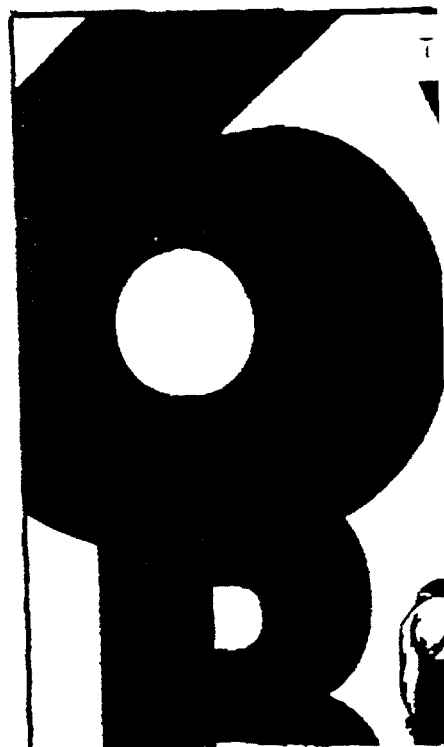
Christopher Robin Blum- Monterey
Philipp Branum- Moss Landing
Barbara Brown- Monterey
Jay Campbell- Pacific Grove
Dolores Chiappone- Pacific Grov
Claude Cirimele- Carmel
Susan Collins- Seaside
Sonia Cook- Davis, CA/Pacific Gr
John Dillon- Weed, CA
Nell Flattery- Pacific Grove
Darrell Fusaro- New York/Pebble
Peggy Garretson- Monterey
Don Graulich- Monterey
Jane Hoppin- Carmel
Heidi Hybl- Carmel
John Itnyre- Santa Cruz
Lynne Jays- Big Sur
Mira Kamada-Monterey

ON THE BEACH SURF SHOP



☀ "Best Selection
& Service in Town" ☀

Complete Line of Surfboards,
Skateboards, Wetsuits, Boogie
Boards, Rollerblades, Vans
Shoes, Airwalk, Clothing &
Accessories



COAST

WEEKLY

FREE

MARCH 3 - 9, 1994

**"Elvis" Sighted
with Best of
Winners!**

BEST OF MONTEREY COUNTY

*The results of our
1994 Readers' Poll*

PAGE 14

Best Radio Station to Listen to on
Your Way to Work

KBOQ

107.7 FM
15.7 AM

Coast Weekly readers reveal themselves as
morning-in-the-morning types who seek
cannon in the "cannon" landscape of the
the gently emerging vibrations of today's
and yesterday's favorites. KBOQ, which
launched a dawn and night show in 1993, has
come back strong with David Whitman, who
comes off in the morning in second place
KBOQ 107.7 FM. General manager Karin
McCauley, who has moved KBOQ to
show for about two years, are coming in
They have a rich, varied and up-to-date
presentation.

personals

Green Adams

.....
**MONTEREY COUNTY
NEWS, ARTS,
ENTERTAINMENT
& CLASSIFIEDS**



for
M O N T E R E Y C O U N T Y

Sunset Center, Room 3 San Carlos at Ninth
Post Office Box #495 Carmel, CA 93921
Phone (408) 622-9060 Fax (408) 622-9061

12 November 1996

Sherrie McCullough
KBOQ
2511 Garden Road, Suite C150
Monterey, CA 93940

Dear Ms McCullough:

It is my pleasure to inform you that KBOQ has been nominated as a *Benefactor of the Arts* of Monterey County. **Congratulations!** You are among the special benefactors whose efforts on behalf of the arts in our county have been brought to our attention.


As President of the CULTURAL COUNCIL FOR MONTEREY COUNTY, I would like to invite you to attend the *Benefactors of the Arts* Awards Night and Dinner. This black-tie event will take place at the Monterey Plaza Hotel on Saturday, November 23 from 6:30 onwards. All nominees will be honored with several selected for special awards.

In presenting these awards, the CULTURAL COUNCIL FOR MONTEREY COUNTY seeks to recognize those individuals and public servants who provide outstanding and noteworthy support of the arts in Monterey County. We wish to demonstrate the gratitude and appreciation of the entire community for your endeavors and leadership.

The CULTURAL COUNCIL FOR MONTEREY COUNTY is a private, not for profit organization promoting education, appreciation and excellence in the arts. CCMC acts as a networking organization for the many cultural entities of Monterey County, helping to provide an array of aesthetic and educational experiences for adults and children. Formed in 1982, it serves as Monterey County's state/local partner to the *California Arts Council*. CCMC is not only the link to the state arts council, but it is also the official, county-appointed arts planning agency.

Should you have any questions, please call David Cloutier, Executive Director at 622.9060.

Sincerely yours,


George Williams
President

1995

Presented to KBOQ Radio

Presented to

KBOQ Radio

In grateful appreciation
for helping others
through

The Salvation Army



John & Helen

CITY HALL
BOX CC
CARMEL-BY-THE-SEA, CALIFORNIA 93921

17 June 1994

Chairperson
Federal Communications Commission
Washington DC

Madam/Sir:

Ninety-five-point-five on the dial is a very important spot for those of us who reside in Carmel-by-the-Sea and the surrounding area -- it is KBOQ, or KBACH, as it is affectionately known in Carmel-by-the-Sea, home of the annual Bach Festival.

As you may know, Carmel-by-the-Sea was founded by artists in the early 1900s. Its reputation as an art colony has flourished over the years and continues to this day. Our population is discriminating, sophisticated and educated; the median age is 53.8; median income is \$36,800; 93% of us are high school graduates; 30% have a bachelor's degree; and a full 18% have a graduate or professional degree. It is not an exaggeration to state that a radio station dedicated to classical music is truly a necessity in this community.

That local need has been identified and met 24 hours a day by the local licensee of 95.5 FM, Classical KBOQ, our own KBACH.

We now understand that the FCC's licensing process regarding local ownership has been challenged and that a Court of Appeals has ruled ordering reconsideration of any process giving preference to a local owner/operator.

Please consider this letter as one of strong support for the present local owner/operator of KBOQ who has served our community well for many years. On behalf of the City of Carmel-by-the-Sea, I urge the FCC to give high priority to responding to the Court of Appeals by determining new comparative hearing criteria that will allow our local licensee to continue to meet the needs of our community.

Thank you for your consideration.

Very truly yours,



Ken White
Mayor

Jon R. Hagstrom

Post Office Box 65 1, Carmel by the Sea, California 93921-6511 - 408-625-0930

June 15, 1994

Ms. McCullough
KBACH
for F.C.C.

This letter is to inform the F.C.C. the importance that KBACH is to the community and the service it provides for the community, first the great classical music that Monterey, Carmel enjoys 24 hours a day and the programming is excellent almost every place of business in Carmel have the station on, all of my friends also listen to KBACH. I cant think of any one in Carmel who does not listen to KBACH. I would also like to remind the F.C.C. the public announcements that KBACH has on the air like Carmel Art festival, Bach festivals, Classic Car Elegance, P.G.A. golf and many more. THESE ARE ALL WORLD CLASS EVENTS and are guests that come to these events listen to KBACH for information on traffic, event time changes and other important information, also the enjoyment of fine music.

In summery we lost KBACH once and were lucky enough to get it back in a short amount of time and respectfully request the F.C.C. not let this loss happen again, the current management does an excellent job.

Respectfully,



Jon R. Hagstrom

June 12, 1994

Federal Communications Commission
Washington, D.C.

Dear Commission Members:

It has come to my attention, through a newspaper article, that the ownership and management of a local radio station is in dispute. As part of the local and loyal community which has waited a long time for this station to come to the airways, this distresses me greatly.

KBOQ serves a great need in this community. In homes, cars and businesses, it is the sole source of classical music on the Peninsula. The sense of need for this genre -- as well as the sense of community -- was demonstrated by the fact that a local high school radio station played continuous loops of classical music during the night, while their young D.J.'s studied and slept. This was the only source of classical music available until KBOQ came on the air.

KBOQ has consistently served its audience with quality selections and talented on-air personalities. It has consistently served the community by sponsoring local events and fundraisers. After such successful service, an F.C.C. review seems unnecessarily costly and unwarranted.

A successful station which serves not only its constituency, but the community at large is, indeed, an asset. Making changes now serves no purpose.

Please reward KBOQ ownership and management for their accomplishments by leaving them securely in place.

Sincerely,

A handwritten signature in cursive script that reads "d'Aulan Gentry". The signature is fluid and elegant, with the first name "d'Aulan" and the last name "Gentry" clearly distinguishable.

d'Aulan Gentry
26650 Rancho San Carlos Road
Carmel, California 93923
(408) 626-2649

L. A. Niedfeldt
1016 San Carlos Road
Pebble Beach, California 93959

408 / 373-6397

FEDERAL COMMUNICATION COMMISSION
WASHINGTON DC. 20554

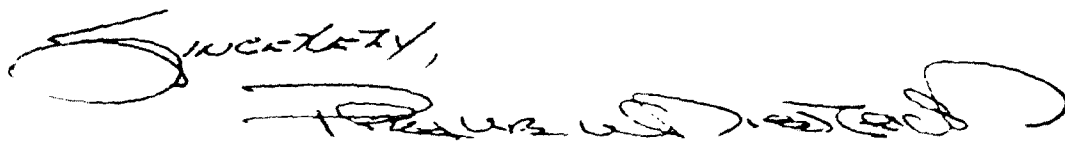
GENTLEMEN: —

KDACH, THE MONTEREY PENINSULA'S ONLY
CLASSICAL MUSIC STATION, IS BOTH A DELIGHT AND
A RESpite FOR ANY LISTENER. IT IS ALSO A
BOON TO AND FOR THE COMMUNITY. —

KDACH'S INVOLVEMENT IN VARIOUS LOCAL
AGENCY'S AND CHARITABLE GROUPS IS TESTIMONY
TO ITS FIRM COMMITMENT IN THIS AREA. THE
UNITED WAY, FAMILY SERVICE AGENCY, HAPPY TO BE
A HAND WITH MONTEREY COUNTY SYMPOHONY ARE ALL
EXAMPLES OF KDACH'S SINCERE AND DEDICATION TO
MAKE A POSITIVE DIFFERENCE. —

THEREFORE, I AM A DEVOTED LISTENER &
SUPPORTER. I HEARTILY ADVOCATE THE CON-
TINUED PRESENCE OF THIS FINE STATION!

Sincerely,


(ME L.A.)